

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FL RECEIVABLE TRUST 2002-A,  
*Plaintiff,*

v.

Bagga Enterprises, Inc.  
Jamuna Real Estate, LLC  
United Management Services, Inc. and  
Welcome Group, Inc.,  
*Defendants*

The Honorable Lowell A. Reed, Jr., S.J.

Civil Action No. 02-2710

Civil Action No. 02-2711

Civil Action No. 02-2080

Civil Action No. 02-2086

**ORDER**

AND NOW, this \_\_\_\_\_ day of November 2003, upon consideration of Plaintiff FL Receivable Trust 2002-A's Motion for Leave to File Under Seal a Motion for Ex Parte TRO, it is hereby **ORDERED** that the Motion is **GRANTED**.

BY THE COURT:

\_\_\_\_\_  
Reed, J.

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FL RECEIVABLE TRUST 2002-A,  
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**PLAINTIFF'S MOTION FOR LEAVE TO FILE  
UNDER SEAL ITS MOTION FOR EX PARTE TRO**

Plaintiff FL Receivable Trust 2002-A, by its attorneys, respectfully moves this Court for Leave to File Under Seal a Motion for Ex Parte TRO. The reasons Plaintiff requests leave to file its Motion ex parte are set forth in the attached Motion for Ex Parte TRO, which is incorporated herein by reference. If Plaintiff were to set forth in a pleading to which Defendants had access the reasons for the Motion and the requested relief, it would defeat the purpose of the Motion.

Respectfully submitted,

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**ORDER**

AND NOW, this \_\_\_\_ day of November, 2003, upon consideration of the Motion of FL Receivable Trust 2002-A for an ex parte temporary restraining order, it is hereby **ORDERED** that:

1. Plaintiff's Motion is **GRANTED**;
2. Bagga Enterprises, Inc., Jamuna, Inc., United Management, Inc., Welcome Group, Inc., Paul Bagga and Kushvinder Bagga, and Gary Ghambir are enjoined from concealing or destroying computerized business records;
3. FL Receivables Trust 2002-A or its attorneys and consultants are permitted to search (i) the offices at 714 Bethlehem Pike, Erdenheim, Pennsylvania, (ii) the residence of Paul and Kushvinder Bagga at 611 Creek Lane, Flourtown, Pennsylvania, and their automobiles, and (iii) the office, home and computers of Gary Ghambir, the Director of Information Systems for Bagga Enterprises, Inc., Jamuna, Inc., United Management, Inc., and Welcome Group, Inc., and the Baggas, for computerized business records related to Bagga Enterprises, Inc., Jamuna, Inc., United Management, Inc., and Welcome Group, Inc., and affiliated companies; and
4. The United States Marshall or his deputy is directed to accompany FL Receivables Trust 2002-A during the search and to enforce the TRO as may be appropriate.

BY THE COURT:

\_\_\_\_\_  
Reed, J.

**IN THE UNITED STATES DISTRICT COURT  
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**PLAINTIFF'S MOTION FOR EX PARTE TRO**

Pursuant to Fed.R.Civ.P. 65(b), plaintiff FL Receivables Trust 2002-A ("FL Receivables") hereby moves the Court for an ex parte TRO to prevent the destruction of evidence and to allow the inspection or seizure and copying thereof without prior notice. In support of its motion, FL Receivables submits the supporting Memorandum of Law and accompanying affidavits, all of which are incorporated herein by reference.

WHEREFORE, FL Receivables Trust 2002-A respectfully requests the entry of an ex parte order (a) enjoining Bagga Enterprises, Inc., Jamuna, Inc., United Management, Inc., Welcome Group, Inc., Paul Bagga and Kushvinder Bagga, and Gary Ghambir from concealing or destroying computerized business records; (b) permitting FL Receivables Trust 2002-A or its attorneys and consultants to search (i) the offices at 714 Bethlehem Pike, Erdenheim, Pennsylvania, (ii) the residence of Paul and Kushvinder Bagga at 611 Creek Lane, Flourtown, Pennsylvania, and their automobiles, and (iii) the office, home and computers of Gary Ghambir, the Director of Information Systems for Bagga Enterprises, Inc., Jamuna, Inc., United Management, Inc., and Welcome Group, Inc., and the Baggas, for computerized business records related to Bagga Enterprises, Inc., Jamuna, Inc., United Management, Inc., and Welcome Group, Inc., and affiliated companies; and (c) further directing the United States Marshall or his deputy to

accompany FL Receivables Trust 2002-A during the search and to enforce the TRO as may be appropriate.

Respectfully submitted,

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